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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of:  
Reform of the Interstate  
Access Charge Rules

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RM-8356

TO: The Commission

**COMMENTS OF  
SOUTHWESTERN BELL TELEPHONE COMPANY**

Southwestern Bell Telephone Company (SWBT), by its attorneys, respectfully files these Comments in full support of the Petition for Rulemaking filed by the United States Telephone Association (USTA Petition) on September 17, 1993. The Petition advocates federal rules changes that the industry has needed for a very long time, and thus the Commission is urged to respond with a notice of proposed rulemaking as requested by USTA at the earliest possible date.

Specifically, USTA observes quite correctly that regulation has failed to keep pace with technological and market developments which have been accelerating in recent years and which have now pushed the current federal access charge plan into obsolescence. Petition, pp. 7-12. Accordingly, USTA makes a number of detailed suggestions regarding areas of needed reform.

USTA also identifies seven key policy goals that the Commission will want to keep at the forefront of its analysis as it embarks on this much-needed regulatory reform. These seven goals are: promote universal service; promote introduction of new services and technologies; support balanced competition in access markets; promote efficient use of the network; encourage continued

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development of an advanced national telecommunications infrastructure; prevent unreasonable discrimination; and minimize regulatory burdens. *Id.*, pp. 14-20. SWBT endorses these seven policy goals, many of which have already been established Commission goals for quite some time, and urges the Commission to reconfirm/adopt each of them as its guiding lights going forward with the essential federal access charge plan reform.

The USTA Petition advances specific proposals in three general areas: structural flexibility, pricing flexibility, and public policy support obligations. Without question, records already compiled by the Commission in several other proceedings clearly reveal that such reforms are critically needed in all of these general areas.<sup>1</sup> Because SWBT does not wish to unnecessarily burden the record with repetition, rather than reciting each of the insightful USTA recommendations herein SWBT will instead merely state its strong general support for each such recommendation.

However, SWBT must stress one point: the industry simply cannot afford delaying the essential access reforms for the sake of a needless exercise such as a mere inquiry proceeding at this late date. SWBT commends NARUC for calling attention to the many important issues described in its Petition for Notice of Inquiry,

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<sup>1</sup> See, e.g., the records on Ameritech's Customers First Proposal and Rochester's similar proposal, CC Docket No. 91-141 (Expanded Interconnection), CC Docket No. 91-213 (Transport Restructure), CC Docket No. 89-79 (Access Unbundling), CC Docket No. 92-222 (GSF Reallocation), CC Docket No. 92-296 (Depreciation Simplification), CC Docket No. 87-313 (Price Caps), CC Docket No. 93-36 (Dominant/Non-Dominant Common Carriers), the various AT&T Tariff 12 proceedings, the NARUC Petition for Notice of Inquiry proceeding, and comments filed concerning the Commission Staff's April 30, 1993 paper "Federal Perspectives on Access Charge Reform."


and agrees that many of those issues must be addressed by the Commission. But the fact is that the Commission already has before it an abundance of record evidence to serve as the basis for the notice of proposed rulemaking sought by USTA (see n. 1, supra). And, that extensive body of record evidence will be expanded still further (and brought completely up-to-date) once the public comments and reply comments in this proceeding have all been filed on November 16, 1993.

SWBT cannot overemphasize the importance of the Commission acting promptly to issue a notice of proposed rulemaking as requested by USTA. The Commission should not allow its access rules to become even further outmoded by advancing technology and rapidly evolving market conditions while it conducts an inquiry into areas on which it already has (or soon will have) a voluminous and fresh record. Communications competitors and consumers alike will continue to be aggrieved by existing obsolete regulation until the Commission confronts this task directly and issues the notice of proposed rulemaking sought by the USTA Petition.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

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November 1, 1993

CERTIFICATE OF SERVICE

I, Liz Jensen, hereby certify that the foregoing  
Comments of Southwestern Bell Telephone Company, in RM-8356,  
have been served this 1st day of November, 1993 to the  
Parties of Record.

Liz Jensen  
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November 1, 1993

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